

COMMUNITY DEVELOPMENT COMMISSION

of the County of Los Angeles

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Gloria Molina Mark Ridley-Thomas Zev Yaroslavsky Don Knabe Michael D. Antonovich Commissioners

Sean Rogan Executive Director

May 01, 2012

The Honorable Board of Supervisors County of Los Angeles 383 Kenneth Hahn Hall of Administration 500 West Temple Street Los Angeles, California 90012

Dear Supervisors:

APPROVE AN AMENDMENT TO THE 2011-2012 ACTION PLAN FOR THE ALLOCATION OF NEW FEDERAL FUNDS (ALL DISTRICTS) (3 VOTE)

SUBJECT

This letter recommends approval of an amendment to the Fiscal Year (FY) 2011-2012 Action Plan (Action Plan) for the Los Angeles Urban County, to enable the County to receive and administer additional funds from the U.S. Department of Housing and Urban Development (HUD) 2011 Emergency Solutions Grant (ESG) program within the 49 participating cities and the unincorporated areas of the County. The ESG program provides financial assistance and services to either prevent at-risk individuals and families from becoming homeless, or help those who are experiencing homelessness to be quickly re-housed and stabilized.

IT IS RECOMMENDED THAT YOUR BOARD:

- 1. Find that the amendment adding ESG funds to the Action Plan is not subject to the California Environmental Quality Act (CEQA) because it is not defined as a project under CEQA and does not have the potential for causing a significant effect on the environment.
- 2. Amend the FY 2011-2012 Action Plan to enable the County to receive an estimated \$729,141 in ESG funds from HUD, to provide financial assistance and services to either prevent at-risk individuals and families from becoming homeless, or help those who are experiencing homelessness to be quickly re-housed and stabilized.
- 3. Designate the Community Development Commission (Commission) to serve as the agent of the County for administration of the allocated ESG funds and any additional funds received from HUD ESG, and designate the Executive Director of the Commission as the official responsible for ensuring

The Honorable Board of Supervisors 5/1/2012 Page 2

the completion of all actions required for administration of the funds.

PURPOSE/JUSTIFICATION OF RECOMMENDED ACTION

On May 24, 2011, your Board approved the 2011-2012 One-Year Action Plan for the Thirty-Seventh Program Year (July 1, 2011 through June 30, 2012) to receive CDBG, HOME and ESG funds from HUD. The Action Plan contains the County's One-Year Action Plan to carry out housing and community development activities funded by these Programs. The proposed addition of \$729,141 in ESG funds is consistent with the purposes set forth in the Action Plan.

FISCAL IMPACT/FINANCING

There is no impact on the County general fund. This program is being funded by HUD for a total amount of \$729,141 in ESG funds. These funds will be included in the Commission's proposed FY 2012-2013 budget.

FACTS AND PROVISIONS/LEGAL REQUIREMENTS

HUD has allocated \$250 million in FY 2011 funds for the ESG program. Because the program regulations were still being revised when the funding became available, HUD chose to release the funding in two stages. The first allocation was made available immediately, to avoid a lapse in funding for existing ESG activities. The County received \$1,296,251 as part of the first allocation. This allocation is being used for traditional ESG activities, which include overnight shelters through the winter shelter and emergency housing programs, the access center program, the emergency response team, and the emergency housing program.

ESG activities in the County are administered by the Los Angeles Homeless Services Authority (LAHSA), a Joint Powers Authority designated in 1993 as an independent agency by the County and the City of Los Angeles. LAHSA is the lead agency in the Los Angeles Continuum of Care (LA CoC), and coordinates and manages over \$70 million dollars annually in Federal, State, County and City funds for programs providing shelter, housing and services to homeless persons in Los Angeles City and County.

On November 15, 2011, HUD announced the amounts of the second allocation of FY 2011 ESG program funds. The County of Los Angeles is eligible for \$729,141 under this allocation. To receive funds from the second allocation, each eligible recipient must prepare and obtain HUD approval of a substantial amendment to its FY 2011 Action Plan. The Action Plan amendment describing the intended use of additional ESG funds is attached to this Board letter, and is due to HUD by May 15, 2012.

For the second allocation, HUD is shifting the focus of the ESG program from emergency shelter to assisting people to quickly regain stability in permanent housing. HUD strongly encourages grantees to focus as much of its new ESG funding as possible on rapidly re-housing families and individuals living on the streets or in emergency shelters. Therefore, the attached Action Plan amendment prioritizes the second allocation of ESG funding for the County of Los Angeles towards homelessness prevention and rapid re-housing.

This letter has been reviewed by County Counsel.

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ENVIRONMENTAL DOCUMENTATION

This action is exempt from the provisions of the National Environmental Policy Act (NEPA) pursuant to 24 Code of Federal Regulations, Part 58, Section 58.34 (a)(3), because it involves administrative activities that will not have a physical impact on or result in any physical changes to the environment. This action is not subject to the provisions of CEQA Guidelines 15060(c)(3) and 15378, because it is not defined as a project under CEQA and does not have the potential for causing a significant effect on the environment.

All ESG funded projects will be reviewed for environmental impact on a project by project basis before funding is released.

IMPACT ON CURRENT SERVICES (OR PROJECTS)

The ESG-funded projects incorporated into the amended Action Plan will benefit low-income residents of the unincorporated County and participating cities.

Respectfully submitted,

SEAN ROGAN

Executive Director

SR:ra

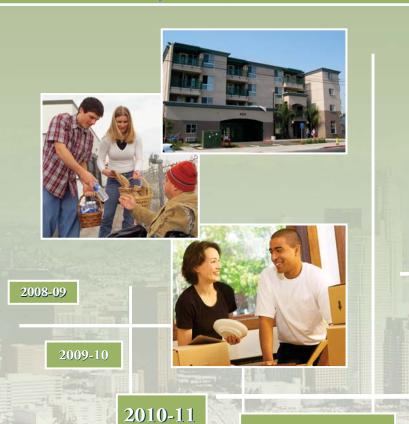
Enclosures

LOS ANGELES URBAN COUNTY 2011-2012

Amendment to

One - Year Action Plan

Emergency Solutions Grant Program



2012-13

2008-2013

HOUSING & COMMUNITY DEVELOPMENT

Consolidated Plan

FOR THE LOS ANGELES URBAN COUNTY







LOS ANGELES URBAN COUNTY 2011-2012 Amendment to the ONE-YEAR ACTION PLAN

EMERGENCY SOLUTIONS GRANT PROGRAM

DRAFT FOR PUBLIC REVIEW

MARCH 23, 2012

COMMUNITY DEVELOPMENT COMMISSION OF THE COUNTY OF LOS ANGELES

SEAN ROGAN Executive Director

APPLICATION FOR					Version 7/03
FEDERAL ASSISTANCE	E	2. DATE SUBMITTED		Applicant Ider	ntifier
1. TYPE OF SUBMISSION: Application	Pre-application	3. DATE RECEIVED BY	STATE	State Applicat	ion Identifier
☐ Construction	☐ Construction	4. DATE RECEIVED BY	FEDERAL AGENCY	Federal Identi	fier
☐ Non-Construction 5. APPLICANT INFORMATION	Non-Construction				
Legal Name:	JN .		Organizational Un	it:	
			Department:		
Organizational DUNS:			Division:		
Address:					erson to be contacted on matters
Street:			Prefix:	First Name:	ea code)
City:			Middle Name		
County:			Last Name		
State:	Zip Code		Suffix:		
Country:	1		Email:		
6. EMPLOYER IDENTIFICAT	ION NUMBER (EIN):		Phone Number (give	e area code)	Fax Number (give area code)
8. TYPE OF APPLICATION:			7. TYPE OF APPLI	CANT: (See bac	k of form for Application Types)
☐ New ☐ Continuation ☐ Revision If Revision, enter appropriate letter(s) in box(es) (See back of form for description of letters.)			Other (specify)		
Other (specify)			9. NAME OF FEDERAL AGENCY:		
10. CATALOG OF FEDERAL	DOMESTIC ASSISTANC	CE NUMBER:	11. DESCRIPTIVE	TITLE OF APPLI	CANT'S PROJECT:
TITLE (Name of Program):					
12. AREAS AFFECTED BY F	PROJECT (Cities, Counties	s, States, etc.):			
13. PROPOSED PROJECT			14. CONGRESSIO	NAL DISTRICTS	OF:
Start Date:	Ending Date:		a. Applicant		b. Project
15. ESTIMATED FUNDING:			16. IS APPLICATION		REVIEW BY STATE EXECUTIVE
a. Federal	\$.00	a Ves THIS P	REAPPLICATION	N/APPLICATION WAS MADE
b. Applicant	\$.00	AVAILABLE TO THE STATE EXECUTIVE ORDE PROCESS FOR REVIEW ON		
c. State	\$.00	DATE:		
d. Local	\$. 00	b. No. 🛮 PROGE	RAM IS NOT COV	/ERED BY E. O. 12372
e. Other	\$. 00	OR PROGRAM HAS NOT BEEN SELECTED BY STAT		T BEEN SELECTED BY STATE
f. Program Income	\$. 00			NT ON ANY FEDERAL DEBT?
g. TOTAL	\$. 00	☐ Yes If "Yes" atta	ach an explanation	n. 🗆 No
ATTACHED ASSURANCES I	Y AUTHORIZED BY THE	GOVERNING BODY OF			TRUE AND CORRECT. THE ANT WILL COMPLY WITH THE
a. Authorized Representative Prefix	First Name		Midd	lle Name	
	i iist ivaiiie				
Last Name			Suffi	Х	

d. Signature of Authorized Representative

b. Title

c. Telephone Number (give area code)

e. Date Signed

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Substantial Amendment to the 2011-2012 Action Plan for the Emergency Solutions Grant Program – 2nd Allocation

BACKGROUND

The Full-Year Continuing Appropriations Act, 2011 (Public Law 112-10, Division B) appropriated at least \$225 million for the Emergency Solutions Program (ESG) for Fiscal Year (FY) 2011. Accordingly, HUD used at its discretion to allocate \$250 million in FY 2011 funds for the ESG program. However, because the program regulations were still being revised when the funding became available, HUD chose to release the funding in a two-stage allocation process. The first allocation was made available immediately, to avoid a lapse in funding for existing Emergency Shelter Grants activities. This allocation, which equaled the FY 2010 ESG funding level of \$160 million, was made in May 2011 and was subject the Emergency Shelter Grants regulations in effect at the time.

The Community Development Commission of the County of Los Angeles (CDC) is the lead agency in administering ESG funding and received \$1,296,251 as part of the first FY 2011 allocation. This allocation is being used for traditional ESG activities which include the following:

1st Allocation: Use of ESG Funds by Eligible Activity

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Eligible Activity	Amount	Percent		
Operating Costs of Homeless Shelters	\$842,564	65%		
Essential Services	\$388,875	30%		
Administration	\$64,812	5%		
Total	\$1,296,251	100%		

The Los Angeles Homeless Services Authority (LAHSA) is a Joint Powers Authority designated in 1993 as an independent agency by the County and the City of Los Angeles. LAHSA is the lead agency in the Los Angeles Continuum of Care (LA CoC), and coordinates and manages over \$70 million dollars annually in Federal, State, County and City funds for programs providing shelter, housing and services to homeless persons in Los Angeles City and County.

LAHSA assist the CDC in administering ESG activities for the County.

On November 15, 2011, HUD posted the interim rule on the Emergency Solutions Grants program and Consolidated Plan conforming amendments (Interim Rule) on this website: www.hudhre.info. On December 15, 2011, the Interim Rule was published in the Federal Register (see 76 FR 75954). Also on November 15, HUD announced the amounts of the second allocation of FY 2011 Emergency Shelter Grants program/Emergency Solutions Grants program funds. To receive funds from the second allocation, each eligible recipient must prepare, and obtain HUD approval of, a substantial amendment to its FY 2011 Consolidated Plan Annual Action Plan (Action Plan). This document comprises the substantial amendment for the County of Los Angeles, which is due to HUD by May 15, 2012.

The Interim Rule shifts the focus from emergency shelter to assisting people to quickly regain stability in permanent housing. This is reflected in the expenditure limits on street outreach and emergency shelter activities, which is capped at 60% of the fiscal year's grant or the amount of FY 2010 grant funds committed for homeless assistance activities. HUD strongly encourages grantees to focus as much of its new ESG funding as possible on rapidly re-housing individuals and families living on the streets or in emergency shelters. Therefore, this substantial amendment prioritizes the 2nd allocation of ESG funding for the County of Los Angeles, which is \$729,141, towards rapid re-housing.

In addition, administrative activities are capped at 7.5% of the entire FY 2011 allocation. HUD raised the expenditure limit on administrative activities from 5% to 7.5% so that grantees, such as the County of Los Angeles, are able to increase their capacity to engage in strategic planning and program oversight.

1. STANDARD FORMS 424

This is the application form that HUD requires grantees to submit to receive ESG funding. The form is located in the front of the document.

2. PROPOSED ACTIVITIES AND OVERALL BUDGET

As the lead administrative agency of Los Angeles Continuum of Care (LA CoC) LAHSA leverages SHP and S+C to prioritize permanent supportive housing. ESG will prioritize rapid rehousing and diversion programs. Currently there is only enough funding to shelter one-third of our homeless population. National preliminary research shows that homeless individuals and families can regain stability with just two to three months of housing assistance.

LAHSA's proposed activities will prevent individuals and families from entering the shelter system and rapidly move those who do enter the shelter system into stable housing. LAHSA will provide financial assistance to clients who are "literally" homeless, with no alternative housing options, financial resources or support networks. To increase the effectiveness of limited resources, LAHSA will use smaller amounts of funds to assist more people.

In administering the HPRP program in Los Angeles, we were able to increase the capacity of our emergency shelters by rapidly moving people from the shelters into permanent housing.

To ensure that LAHSA's funding priorities align with national goals established in the Federal Strategic Plan to Prevent and End Homelessness as well as best benefit the LA CoC, LAHSA has adopted Funding Principles that include recommendations from the LA CoC Coordinating Council (elected leadership of homeless coalitions); and have been approved by the LAHSA Board of Commissioners. LAHSA is committed to funding LA CoC programs whose performance closely meets or exceeds the highest performance standards outlined below:

- Fund programs that target chronically homeless, veterans, families and youth
- Fund programs that are fully utilizing the Homeless Management Information System (HMIS), the LA CoC system of record; or are committed to utilizing HMIS

- Fund programs that are outcomes-driven with performance standards that, where applicable, meet or exceed HUD requirements
- Promote fair-share funding distribution to solve local community homelessness
- Fund programs that demonstrate community and continuum integration that is part of a "system of care"
- Fund programs that are cost effective and reflect local and national leading practices

Obstacles to Addressing Underserved Needs in the Community

Potential obstacles to addressing underserved needs in the community are the high cost of living, the high rate of unemployment, and the limited permanent and affordable housing stock. These factors will make it more challenging for homeless individuals and families to transition to stability in the community and increase their income to support themselves independently.

Additionally, efforts to reduce the federal deficit are expected to continue to overshadow the FY2013 federal budget and appropriations process in 2012. The Budget Control Act of 2011 mandates that the federal deficit be reduced by \$1.2 trillion over a ten year period. LAHSA anticipates across-the-board cuts to go into effect for federal homeless and affordable housing programs beginning in January 2013. Currently, sequestration is estimated to result in a 9.1% across-the-board cut to non-defense discretionary programs.

Although many important programs serving low-income people, including TANF, Medicaid, Supplemental Security Income (SSI), and SNAP (formerly Food Stamps), are exempt from sequestration, nearly every single homeless assistance and affordable housing program would be cut.

Coordinated Crisis Response System for Families

This new LAHSA ESG program for the Los Angeles CoC will further HEARTH/ESG goals of reducing lengths of stay in emergency shelter and transitional housing, rapid re-housing, housing retention and diversion from shelter by:

- Focusing on assisting those already homeless and prevent those who have previously exited homelessness from returning to homelessness.
- Shifting from a linear Continuum of Care model to a "Crisis Response System" that moves/returns people to housing quickly and provides the specific level of assistance and services needed by that family or individual to remain in housing.
- Building on lessons learned from HPRP.
- Collaborating with mainstream resources and other resources that serve the homeless.

Specifically, the program will begin by addressing the family system of care using the Family Transition Program (FTP) sites (six sites throughout the County by Service Planning Aares (SPA). Services funding will be coordinated with new County-funded Family Connections sites. The program will launch in July 2012. ESG funds will be used to build diversion and rapid rehousing activities into the existing FTP and/or new Family Connections sites. The LA County 211 system will screen callers for basic eligibility for diversion, rapid rehousing, shelter or

transitional housing and refer to FTP site and/or Family Connections sites (some FTP sites may also become Family Connections sites). ESG activities will leverage case management/housing stabilization funding and services through County-funded Family Connections site.

Each Family Connections site will work with/train Emergency Shelters and Transitional Housing programs in the region to educate them on rapid re-housing, help reduce lengths of stay and target appropriate the populations. Each Family Connections site will work closely with other County-funded housing and services programs and each site will have a joint MOU with other programs in the region that provide housing and services.

ESG will provide security deposit assistance to singles and youth who have received long-term housing subsidies but need security deposit. Linking Transitional Housing and Emergency Shelters with all the other Countywide programs which have been tasked with housing and stabilization services will substantially improve coordination within the Los Angeles CoC.

Lastly, LAHSA will have flexible pot of money set-aside to assist vulnerable clients (e.g. elderly on fixed incomes and disabilities who are about to be evicted) with prevention and diversion assistance.

The table on the next two pages provides a summary of funding that the County of Los Angeles will receive in FY 2011 and what activities are planned to be funded.

FY 2011 Detailed Budget Table					
First Allocation	\$1,296,251		FY 2011		
Second Allocation	\$729,141	Emergency Shelter Grants/Emergency Solutions Grants			
Grant Amount	\$2,025,392		Program Alloca	<u>itions</u>	
Total Administration	\$151,904				
		First Allocation		Second Allocation	Total Fiscal Year 2011
	Eligible Activities	Activity Amount	Reprogrammed Amount	Activity Amount	Activity Amount
n n	Homeless Assistance	\$1,231,439	\$0.00		\$1,231,439
nelt ran	Rehab/Conversion	\$0.00	\$0.00		\$0.00
v SI	Operations	\$842,564	\$0.00		\$842,564
nc,	Essential Services	\$388,875	\$0.00		\$388,875
Emergency Shelter Grants Program	Homelessness Prevention	\$0.00	\$0.00		\$0.00
Er	Administration	\$64,812	\$0.00		\$64,812
	Emergency Shelter Grants Subtotal	\$1,296,251	\$0.00		\$1,296,251

SEE NEXT PAGE

		Total Grant Amount:	\$2,025,392	\$2,025,392
	Emergency Solutions Grants Subtotal	\$0.00	\$729,141	\$729,141
	Administration		\$87,092	\$87,092
	Project-Based Rental Assistance	\$0.00	\$0.00	\$0.00
	Tenant-Based Rental Assistance	\$0.00	\$0.00	\$0.00
Emerg	Housing Relocation and Stabilization Services	\$0.00	\$0.00	\$0.00
ency 5	Homelessness Prevention	\$0.00	\$0.00	\$0.00
Solutic	Project-Based Rental Assistance	\$0.00	\$0.00	\$0.00
ons Gr	Tenant-Based Rental Assistance	\$0.00	\$0.00	\$0.00
Emergency Solutions Grants Program	Housing Relocation and Stabilization Services	\$0.00	\$0.00	\$0.00
ogra	Rapid Re-housing	\$0.00	\$605,592	\$605,592
Ħ	HMIS	\$0.00	\$36,457	\$36,457
	Street Outreach - Essential Services**		\$0.00	\$0.00
	URA Assistance**		\$0.00	\$0.00
	Essential Service**		\$0.00	\$0.00
	Operation**		\$0.00	\$0.00
	Renovation**		\$0.00	\$0.00
	Emergency Shelter**		\$0.00	\$0.00

^{**}Allowable only if the amount obligated for homeless assistance activities using funds from the first allocation is less than the expenditure limit for emergency shelter and street outreach activities.

Activity Number 1				
Activity Name	ESG Administration			
Activity Description	Activity will ensure compliance with all regulations pertinent to the administration of the ESG program including training and monitoring of subrecipients that receive ESG funding and submittal of information needed to comply with statutory reporting requirements.			
Priority Need	Homeless & HIV/AIDS			
Objective Category	Suitable Living Environment			
Outcome Category	Availability/Accessibility			
Projected Start Date	July 1, 2012			
Projected End Date	June 30, 2014			
Performance	See Section 9	Performance Standards		
Indicator(s)	See Section 9 – Performance Standards			
Proposed Accomplishments	N/A: Administration Activity			
_	Source of Funding	Dollar Amount		
Dudget	ESG	\$87,092		
Budget	Other: County of Los Angeles General Funds	\$1,762,417		
Total Budget for Activity \$1,849		\$1,849,509		
	Name	Community Development Commission of the County of Los Angeles		
Responsible	Location	2 Coral Circle, Monterey Park, CA 91755		
Organization	Administrator Contact Info	Linda Jenkins, Manager CDBG Division (323) 890-7168 linda.jenkins@lacdc.org		

Activity Number 2				
Activity Name	Homeless Management Information System (HMIS)			
Activity Description	The Homeless Management Information System (HMIS) is mandated by HUD to provide information about the demographics, needs and program outcomes of a jurisdiction's homeless population. Under new HEARTH Act regulations, expenditures for HMIS are allowable. Budgeted activities will support the mandatory participation of all ESG recipients; HMIS work will include general system oversight and training on ESG data element requirements, as well as data quality			
	1 11	e program providers and the Continuum		
Priority Need	of Care. Homeless & HIV/AIDS			
Objective Category	Suitable Living Environment			
Outcome Category	Availability/Accessibility			
Projected Start Date	July 1, 2012			
Projected End Date	June 30, 2014			
Performance Indicator(s)	See Section 9 – Performance Standards			
Proposed Accomplishments	Serve 400 persons			
_	Source of Funding	Dollar Amount		
	ESG	\$36,457		
Budget	Other: HUD HMIS	\$980,665		
	Other: County of Los Angeles General Funds	\$122,583		
Total Budget for Activ	vity	\$1,139,705		
	Name	Community Development Commission of the County of Los Angeles		
Responsible Organization	Location	2 Coral Circle, Monterey Park, CA 91755		
OI gainzauon	Administrator Contact Info	Linda Jenkins, Manager CDBG Division (323) 890-7168 linda.jenkins@lacdc.org		

Activity Number 3				
Activity Name	Rapid Re-Housing			
Activity Description	The new ESG budget category will fund primarily rapid re-housing program activities and on a very limited basis, diversion activities. Working with the County of Los Angeles, the City and LAHSA are building on the local infrastructure developed since 2009 with the American Recovery and Reinvestment Act (ARRA)-funded HPRP grant to develop an ongoing program that will assist participants with the following activities: Financial Assistance – this may include rental application fees, security deposits (no more than two months), last month's rent, utility deposits and payments, and moving costs. Housing Relocation and Stabilization – these may include service-related costs such as housing search and placement, housing stability case management, mediation, legal services and credit repair			
Priority Need	Homeless & HIV/AIDS			
Objective Category	Suitable Living Environment			
Outcome Category	Availability/Accessibility			
Projected Start Date	July 1, 2012			
Projected End Date	June 30, 2014			
Performance Indicator(s)	See Section 9 – Performance Standards			
Proposed Accomplishments	Serve 400 persons			
	Source of Funding	Dollar Amount		
Budget	ESG	\$605,592		
	Other: City of Los Angeles ESG	\$1,764,975		
Total Budget for Activ	vity	\$2,370,567		
	Name	Community Development Commission of the County of Los Angeles		
Responsible Organization	Location	2 Coral Circle, Monterey Park, CA 91755		
Organization	Administrator Contact Info	Linda Jenkins, Manager CDBG Division (323) 890-7168 linda.jenkins@lacdc.org		

3. SUMMARY OF CONSULTATION PROCESS

The CDC has consulted with the LA CoC to determine how to allocate ESG funds for eligible activities such as developing the performance standards; and policies, and procedures for the operation and administration of the HMIS.

Specifically, the CDC consulted with the LAHSA Commission, which has been designated as the lead governing body of the LA CoC. The ten member Board of Commissioners consists of five members appointed by the Mayor and confirmed by City Council, and one by each of the five County Supervisors.

LAHSA's mission is to support, create and sustain solutions to homelessness in Los Angeles County by providing leadership, advocacy, planning, and management of program funding. As a lead entity administering homeless funds, LAHSA is responsible for the planning process for the LA CoC. The LA CoC is comprised of the County of Los Angeles except for the cities of Pasadena, Glendale and Long Beach which have their own Continuums. The Commission sets funding priorities and policy for homeless programs administered by LAHSA.

LAHSA is currently working with the City and County of Los Angeles to leverage existing City ESG resources to create a more robust countywide program. Additionally, LAHSA is engaged in preliminary discussions with the five other ESG entitlement jurisdictions in the county. They are: Compton, El Monte, Inglewood, South Gate and Pomona. The purpose is to explore the possibilities of collaboration to strengthen the LA CoC.

Public Meetings with Agencies Regarding ESG/HPRP

The LAHSA Commission and Programs and Evaluations Committee of the Commission hold public monthly meetings throughout the year.

LAHSA works with Agencies in each of the eight Service Planning Areas on a regular basis to identify and address the most critical needs in their community and educate them on national leading practices as well as policy and funding changes. This includes:

- o Organizing and facilitating 12 SPA wide Continuum of Care meetings quarterly
- o Organizing and facilitating quarterly meetings for the Continuum's Coordinating Council (elected leadership of homeless coalitions).
- Attending and presenting information and trainings on trends, best practices and legislation to monthly homeless coalition meetings (approximately 150 meetings per year).

4. SUMMARY OF CITIZEN PARTICIPATION PROCESS

The CDC will advertise a public notice in the following newspapers before March 23, 2012: Los Angeles Times, La Opinion (Spanish), Korea Times (Korean), Chinese Daily Journal (Chinese, and Panorama (Russian). The public notice will inform residents of the availability of the proposed amendment and that they have 30 calendar days from March 23, 2012 to April 23, 2012 to provide written comments.

Citizens are encouraged to submit written comments during the public review and comment period and mail them, postmarked no later than April 23, 2012, to the CDC, 2 Coral Circle, Monterey Park, CA 91755, to the attention of Raymond Webster, CDBG Division.

The substantial amendment will also be available at the public counter at 2 Coral Circle, Monterey Park, CA 91755 and posted at the following web address: http://www3.lacdc.org/CDCWebsite/CDBG/PlansReports.aspx?id=2520

The CDC will solicit public comment at the LAHSA Commission meeting scheduled for April 27, 2012.

The County Board of Supervisors will also hold a meeting on May 1, 2012 to consider approving the substantial amendment

5. MATCH

ESG regulations require a dollar-for-dollar match. Matching funds will be provided through funds received by LAHSA for the Supportive Housing Program (SHP) and for the County Year Round Emergency Shelter Program. The Los Angeles Continuum of Care receives \$83 million in SHP funds annually from the Department of Housing and Urban Development, and \$2.3 million funds annually from the County of Los Angeles General Fund.

6. WRITTEN STANDARDS FOR PROVISION OF ESG ASSISTANCE

a. Standard policies and procedures for evaluating individuals' and families eligibility for assistance under emergency solutions grant (ESG)

Working with the County, LAHSA is developing a common screening tool to provide "right-sized" intervention to each household; with a common set of "standards" for process flow, eligible populations and expected performance outcomes. County-funded Family Connections sites (as described in section 2) will have an MSW and housing location/stabilization expert who will ensure "right-sized" intervention, whether diversion or entry into shelter system followed by rapid re-housing. Common set of "standards" for process flow, eligible populations and expected performance outcomes.

b. Policies and procedures for coordination among emergency shelter providers, essential service providers, homeless prevention and rapid re-housing assistance providers, other homeless assistance providers, and mainstream service and housing providers.

As outlined above, the family system of care will utilize the Family Transition Program (FTP)'s sites [six sites throughout the County by Service Planning Areas (SPA)]. Services funding will be coordinated with new County-funded Family Connections sites. The program will launch in July 2012. FTP was implemented as a way to jumpstart coordination of services for homeless and/or at-risk families. ESG funds will also be used to build diversion and rapid re-housing activities into the existing FTP and/or new Family Connections sites; and the LA County 211 system will screen callers for basic eligibility for diversion, rapid re-housing, shelter or transitional housing and refer to FTP site and/or Family Connections sites (some FTP sites may also become Family Connections sites)

c. Policies and procedures for determining and prioritizing which eligible families and individuals will receive homelessness prevention assistance and which eligible families and individuals will receive rapid re-housing assistance.

ESG will provide security deposit assistance to singles and youth who have received long-term housing subsidies but need security deposit. Transitional Housing and Emergency Shelters will also be linked with all the other Countywide programs which have been tasked with housing and stabilization services.

LAHSA will have flexible pot of money set-aside to assist vulnerable clients (e.g. elderly on fixed incomes and disabilities who are about to be evicted) with prevention and diversion assistance.

- d. Standards for determining the share of rent and utilities costs that each program recipient must pay, if any, while receiving homelessness prevention or rapid rehousing assistance.
- e. Standards for determining how long a particular program participant will be provided with rental assistance and whether and how the amount of that assistance will be adjusted over time.
- f. Standards for determining the type, amount, and duration of housing stabilization and/or relocation services to provide a program participant, including limits, if any, on the homelessness prevention or rapid re-housing assistance that each program participant may receive, such as the maximum amount of assistance, maximum number of months the program participant receives assistance; or the maximum number of times the program participant may receive assistance.

Progressive engagement of clients will begin with short intervention and tailor if client requires a longer intervention. Security deposit will begin with 1-3 months rental assistance. Initially, Coordinated Crisis Response System will provide rental assistance only to families. Families receiving rental assistance must contribute at least 50% of rent. Clients will be re-assessed at 3

months. Family Connections' case managers/housing stabilization experts will provide services to those who need longer-term assistance.

ESG activities will leverage case management/housing stabilization funding and services through County-funded Family Connections site. Family Connections site will work with/train Emergency Shelters and Transitional Housing programs in the region to educate them on rapid rehousing, help reduce lengths of stay and target the appropriate populations; site staff will work closely with other County-funded housing and services programs (each site will have a joint MOU with other programs in the region that provide housing and services).

7. MAKING SUB-AWARDS

Program funding is distributed through a competitive bid process. In response to Request for Proposals (RFPs) released by LAHSA, agencies may submit an application for funding to operate the specified program(s). Awards are made based upon the review and scoring criteria stated in the RFP. The LAHSA Board of Commissioners makes funding awards, after which annual contracts are negotiated with the successful bidders. LAHSA will obtain the required approval of the County of Los Angeles prior to finalizing contracts with contractors. The majority of RFP's for LAHSA programs are released on a three-year cycle.

RFP's issued by LAHSA will include LAHSA's expectations, in as detailed a manner as possible, including expertise and experience requirements. In addition, description of the bid process, which includes timelines, deadlines, and how LAHSA will interact and communicate with potential bidders, deliverables required, will be included in the RFP.

Exceptions to this are instances of sole source contractors and where the legislative body authorizing and providing funding designates a provider of services or supplies. Exceptions may occur if the award of a contract through the RFP process is not feasible or practical in the judgment of the LAHSA Executive Director, and is supported by written documentation for the rationale for such judgment. Typically, such judgment shall be deemed appropriate in the following circumstances:

- 1. The item or service is only available from a single source, or is copyrighted or legally owned by that source;
- 2. The item, supply or professional services required is so specialized or unique so as to make identification of appropriate competitive bidders extremely difficult or impossible to find;
- 3. The procurement represents the augmentation of current services provided by specific vendor and utilization of another source would be impractical and inefficient to the process or deliverable.
- 4. The needs of LAHSA are urgent and a formal RFB process would create significant hardship or jeopardy to LAHSA;

5. An emergency exists that seriously threatens the public health, welfare or safety of staff or clients or immediately endangers property.

8. HOMELESS PARTICIPATION REQUIREMENT

LAHSA's Board of Commissioners are appointed in accordance with the makeup requirements of the Joint Powers Authority. The Los Angeles Continuum of Care (CoC), for which LAHSA is the lead agency, has convened a coordinating council made up of community leaders representing each of the eight Service Planning Areas throughout the CoC. This body is instrumental in making decisions regarding CoC priorities and in providing final recommendations to the LAHSA Board of Commissioners for new CoC awards. The current makeup of this coordinating council includes a formerly homeless individual.

9. PERFORMANCE STANDARDS

The performance standards LAHSA utilizes to evaluate all of the programs it funds are based on a mix of federal sources and regulations, national best practices, and continuum priorities. These standards are developed by LAHSA staff, with feedback from local service providers, and are presented to the LAHSA Commission for approval and adoption annually. This year, LAHSA has focused on building more flexibility into its current set of performance standards by prioritizing 10% performance improvements at the program level, rather than strict continuum goal achievement.

The following table summarizes the LAHSA performance standards that apply to ESG activities and the programs that will be evaluated by them:

Performance Standard	Applies to
Placement of those served into Emergency Shelters,	Access Centers
Transitional Housing, Safe Havens, or Permanent Housing.	
Continuum goal: 65%.	Drop-In Centers
	Street Outreach
Connection of those with physical disabilities, developmental	Access Centers
disabilities, chronic health issues, HIV/AIDS, mental health	
issues, and/or substance abuse issues to services that address	Drop-In Centers
those conditions. Continuum goal: 35%	
	Street Outreach
Tracking of the length of time from a full needs assessment to	Access Centers
housing placement	
	Drop-In Centers
	Street Outreach
Bed / unit utilization rates. Continuum goal: 95%	Emergency Shelters
Placement of those exited into Permanent Housing. Continuum	Emergency Shelters
goal: 65%	
Maintaining or Increasing income from mainstream benefits or	Emergency Shelters
employment. Continuum goal: 20%	
Reduction in the average length of stay of all those served.	Emergency Shelters
Continuum goal: 10%	
Complete and accurate HMIS data entered by providers.	All programs
Continuum goal: 90%	
Tracking movement between programs of the same type	All programs
Tracking the rate at which clients leave a program due to non-	All programs
compliance	

In addition, LAHSA is in the final stages of developing a report that will help the continuum track aggregate performance in the following areas:

- Recidivism
- Bed utilization rates
- Bed turnover rates
- Average length of time homeless
- Diversion from emergency shelters
- Service linkages for those with specific barriers
- Exits due to non-compliance
- Successful housing placements
- Housing retention rates
- Completion of vocational training
- Employment rates
- Mainstream benefit rates

Finally, LAHSA has developed a set of funding principles that outline overall performance standards for all funded programs. These standards are used to help determine whether or not a potential or currently funded program is meeting the needs of the continuum, and to calculate the extent to which an underperforming program may receive funding reductions. These standards evaluate the extent to which each program:

- Emphasizes housing
- Targets its services to the chronically homeless, veterans, families, and youth
- Utilizes the continuum's HMIS
- Provides permanent supportive housing
- Meets the HUD performance standards of placement in permanent housing, retention in permanent housing, and employment at exit
- Helps solve local and regional homelessness
- Demonstrates integration into the system of care of its community and the continuum
- Is cost effective and meets local best practices around cost per bed or unit provided
- Houses people from the community in which it operates
- Can become fully operational within a reasonable amount of time

10. CERTIFICATIONS

The certifications are located on the next pages.

ESG Certifications

The Emergency Solutions Grants Program Recipient certifies that:

Major rehabilitation/conversion – If an emergency shelter's rehabilitation costs exceed 75 percent of the value of the building before rehabilitation, the jurisdiction will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed rehabilitation. If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the jurisdiction will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed conversion. In all other cases where ESG funds are used for renovation, the jurisdiction will maintain the building as a shelter for homeless individuals and families for a minimum of 3 years after the date the building is first occupied by a homeless individual or family after the completed renovation.

Essential Services and Operating Costs – In the case of assistance involving shelter operations or essential services related to street outreach or emergency shelter, the jurisdiction will provide services or shelter to homeless individuals and families for the period during which the ESG assistance is provided, without regard to a particular site or structure, so long the jurisdiction serves the same type of persons (e.g., families with children, unaccompanied youth, disabled individuals, or victims of domestic violence) or persons in the same geographic area.

Renovation – Any renovation carried out with ESG assistance shall be sufficient to ensure that the building involved is safe and sanitary.

Supportive Services – The jurisdiction will assist homeless individuals in obtaining permanent housing, appropriate supportive services (including medical and mental health treatment, victim services, counseling, supervision, and other services essential for achieving independent living), and other Federal State, local, and private assistance available for such individuals.

Matching Funds – The jurisdiction will obtain matching amounts required under 24 CFR 576.201.

Confidentiality – The jurisdiction has established and is implementing procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under the ESG program, including protection against the release of the address or location of any family violence shelter project, except with the written authorization of the person responsible for the operation of that shelter.

Homeless Persons Involvement – To the maximum extent practicable, the jurisdiction will involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted under the ESG program, in providing services assisted under the ESG program, and in providing services for occupants of facilities assisted under the program.

Consolidated Plan – All activities the jurisdiction undertakes with assistance under ESG are consistent with the jurisdiction's consolidated plan.

Discharge Policy – The jurisdiction will establish and implement, to the maximum extent practicable and where appropriate policies and protocols for the discharge of persons from

publicly funded institutions or systems of care (such as health care facilities, mental health facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent this discharge from immediately resulting in homelessness for these persons.

Signature/Authorized Official	6/1/12	
Signature/Authorized Official	Date	
Executive Director		
Title		